

REMARKS

The Examiner provides that claims 1-9, 40-57 and 88-102 are pending (as applicants presented in the last Amendment). However, claims 41, 42, 89 and 90 were canceled in an earlier Amendment responsive to an Office Action dated October 18, 2001 and claims 2, 3, 5, 50, 51 and 53 are canceled herein without prejudice. In addition, claims 103 to 208 are added as new claims by this amendment. Therefore, the pending claims are claims 1, 4, 6-9, 40, 43-49, 52, 54-57, 88 and 91-102, all of which stand rejected, as well as new claims 103 to 208. Claims 1, 40, 49, 88, 97 and 98 have been amended and all rejections are respectfully traversed.

Claims 1, 40, 49, 88, 97 and 98 are amended to define the Applicants' invention more precisely. In addition, claims 103 to 208 have been added. Support for each of the amendments as well as the new claims can be found in the originally filed claims, Figs. 6A-6C of the pending application which show the functionality of the personal expert interface as well as the text supporting these figures and Fig. 7 which shows an example of a personal expert interface and the text supporting this figure.

First, applicants respond generally to selected portions of the Office Action section titled "Response to Arguments." In paragraph 6, page 4, the Examiner compares "fora" as used in the present application to "topic" as used in Uyama (U.S. Patent No. 5,819,267) and is unclear about the "conceptual distinction" made by applicants. "Fora" as used in the present application are web pages having predetermined subject matters or categories which are listed in order for a user to select the subject matter most relevant to his inquiry. In contrast, "topic"

as used in Uyama is determined by a processing system based on a question by a user. The topic is then used to select information relevant to the question in order to provide an answer. The Uyama user does not select a topic and is not presented with topics. Rather, the Uyama processing system works with topics to present an answer to a question posed by a user. Certainly the terms "fora" and "topic" relate to subject matter and therefore can be said in one sense to be similar. However, the terms must be analyzed in light of their use in the present application and Uyama, and their use in these contexts is entirely different.

Applicants also respond to the Examiner's argument in paragraph 6, page 4 regarding the "answer and refer" feature of the present application. The Examiner provides that Uyama teaches "allow[ing] a consultant to transmit a difficult question he cannot answer... to another consultant... or to post the question to the electronic bulletin board." However, the teaching attributed to Uyama by the Examiner involves the expert's merely passing the questions to the next expert in the queue for an answer. The Uyama expert does not select a particular expert to whom to refer the question. In addition, the Uyama expert does not answer. Rather, the expert sends the question to someone else specifically because "he cannot answer" it. Therefore, Uyama does not teach the refer feature nor the answer and refer feature of the present application. This will be discussed further below to the extent that it is relevant to specific rejections.

Second, applicants address the Examiner's claim rejections seriatim. In paragraph 9, page 5 of the Office Action, the Examiner rejects claims 1-9, 40, 43-57, 88 and 91-96 under 35 U.S.C. 103(a) as being unpatentable over Uyama in view of Dworkin (U.S.

Patent No. 6,026,148, Dworkin et al.) and further in view of Walker (U.S. Patent No. 5,862,223; Walker et al.). Claims 1, 40, 49, 88, 97 and 98 are independent. Applicants have further amended each of the independent claims to make clear that the personal expert interface ("PEI") is unique to each expert and includes a set of questions which are grouped and identified as open questions and are routed to the expert from users or other experts. This collection of open questions provides a single source for all outstanding questions for the expert. The Examiner admits that Uyama does not teach a PEI. The Examiner then argues, however, that Dworkin teaches the PEI as follows: "Dworkin users and respondents use the same interface... and thus respondents (the experts) are displaying questions routed to them along with other questions." In contrast, the Dworkin users and experts share the same interface so that there is no teaching of an interface unique to each expert. Furthermore, the general teaching in Uyama of an "interface apparatus" including question/answer means to browse questions does not explicitly or implicitly teach a PEI unique to each expert or the means of selection by users and other experts for routing the questions to such an interface. Neither Dworkin nor Uyama teach explicitly or implicitly at least two elements of each independent claim. The first element is the PEI unique to each expert and the second element is a PEI containing a collection of grouped and identified open questions based on routing requests from users and other experts. Where at least one element of a claim is not taught by any cited prior art reference, an obviousness rejection is inappropriate.

In discussing claim 40 in paragraph 9, pages 10-11, the Examiner asserted that Uyama teaches placing a question for an expert "in an experts receive area (a location accessible to only one expert)" (no citation is provided). Claim 40 as well as the other

independent claims have been amended to more clearly recite that the question is placed in a PEI unique to the expert and that the PEI also contains the set of questions which are grouped and identified as open questions and are routed to the expert from users or other experts. Uyama does not teach a PEI with the collection of open questions presented in a single source for the expert. The Examiner also asserts that Walker as well as other patents teach "routing a question to multiple selected experts and discloses each expert has private access to his/her questions." The Examiner also took official notice that it was known at the time of the invention "to route the question in an expert server system to a plurality of experts." These alleged teachings are not directed to multiple experts wherein each expert has a PEI unique to the expert and the PEI contains a collection of each open question directed from users and other experts. Rather, the alleged teachings involve a single question presented to a single expert at a time. The Examiner's asserted teachings do not address the particular features of the claims as amended and presently pending. Where at least one element of a claim is not taught by any cited prior art reference, an obviousness rejection is inappropriate.

The remaining independent claims have been amended to reflect a PEI unique to each expert and containing questions routed to the expert from users and other experts to create a collection of open questions. For the reasons explained above with respect to claims 1 and 40, these features are believed to distinguish the claims patentably over Uyama, Dworkin, Walker or their combination. Accordingly, all of the pending independent claims (and likewise the claims which depend from them) are believed to be in condition for allowance. Applicants therefore respectfully request that the obviousness rejection of claims 1, 40, 49, 88 and 97 (and

the claims which depend from them) be withdrawn and the claims be allowed and passed to issue.

The daemon will connect new questions with consultants currently signed on. This is determined by the level at which the consultant signs on and by his specialty list... If there is more than one consultant on a given level, a new question is given to one of those consultants with a specialty in that question topic. (OLC reference, page 85, para. 3.2.3.)

It is possible to configure the daemon so that it will forward the question to a log when a certain number of consultants have been connected to the question but have failed to resolve it. (OLC reference, page 87, para. 3.4.1.)

Even when a particular consultant may not know the answer to a question or problem, it is reassuring to the user to know that he is able to contact another person on the network. (OLC reference, page 91, para. 7.)

These citations to the OLC reference make clear that questions to routed to consultants on a queuing system so that the user does not have any control over the consultant to whom a question is routed and, similarly, a consultant does not have any control over the selection of another consultant to whom the question is routed if the first consultant does not provide an answer. While the OLC reference teaches routing the question to multiple consultants where an answer is not provided, the selection of subsequent consultants is not performed by previous consultants. Hence, Uyama does not teach the referral feature of the pending claims.

In addition, the Uyama consultant does not answer the question. Rather, the system sends the question to another consultant specifically because the first consultant does

not provide an answer. Therefore, Uyama does not teach the refer feature nor the answer and refer feature of the present application. The Examiner then argues that Dworkin teaches that a user answers a question then posts it for peer review (no citation to the patent is provided). Applicants believe that the relevant teaching in Dworkin is as follows: "[T]he icon labeled 'Post Answer' enables the user to post an answer or opinion on the subject. If the user who posts an answer is not one of the expert respondents, then the existence of the answer is indicated on the left-hand side of the screen..." (Col. 5, lines 29-33). First, this "post answer" activity is not in response to a question posed to an expert, even if the user in this case is an expert. Rather, it is merely a user in the form of a questioner or expert commenting on information without being asked to do so. Second, there is no teaching that a referral is made at the same time to another expert in Dworkin. As a result, there is no teaching in Dworkin of the "refer" aspect of the "answer and refer" feature. In addition, since neither of the Uyama or Dworkin references teach both aspects of "answer" and "refer," there is no teaching of the two aspects occurring at substantially the same time.

Applicants' attorney has made every effort to place this patent application in condition for allowance. It is therefore earnestly requested that the present amendment be entered, that the application as a whole receive favorable reconsideration, and that all of the claims be allowed as presently constituted. Should there remain any unanswered questions, the Examiner is requested to call the Applicants' undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Dated: June 4, 2003

Cheryl Milone Bab / *Reg*
Cheryl Milone Bab
Reg. No. 43,480
Attorney for Applicants
45,168

DARBY & DARBY P.C.
Post Office Box 5257
New York, NY 10150-5257
212-527-7700

1. (Twice Amended) A method, executed by a server, for providing answers on one or more topics from a set of experts on each topic to questions posed by users in communication with client interfaces, the server being in communication with the client interfaces and the set of experts, and the method comprising;

receiving at the server a question received from [a] one of the [user] users via one of the client interfaces;

receiving at the server a selection by the user of one expert to whom to direct the question;

identifying the question with a discrete group of open questions for the expert to answer, at least one of the open questions in the group being specifically designated to be routed to the expert by one of (a) one of the users and (b) one of the experts;

routing the question to the [one of the experts selected by the user] expert via a personal expert interface, wherein the personal expert interface is unique to the expert and said routing the question comprises displaying on the personal expert interface the question with [other questions] each of the open questions similarly designated[for said one of the experts on the personal expert interface of said one of the experts];

receiving a command from the [selected] expert in response to the question; and

executing [the] a command from the [selected] expert automatically.

40. (Thrice Amended) A method for providing answers on one or more topics from a set of experts on each topic to questions posed by users via client interfaces in communication with a server and with the set of experts, the method comprising:

receiving at one of the client interfaces a question on the selected topic;

transmitting the question from the client interface to the server;

routing the question to a plurality of experts, at least one of them selected by the user, [by] via posting the question at substantially the same time [in a plurality of locations] to a plurality of personal expert interfaces, wherein each of said [locations] personal expert interfaces is accessible to only one expert of said set of experts and includes the question as one of a set of open questions separately grouped and identified as open questions for the one expert to answer and at least one of the open questions being routed to the one expert based on requests from one of (a) one of the users and (b) one of the experts;

receiving a command at the server from [an] the one expert in response to the question; and

executing the command from the one expert automatically.

49. (Twice Amended) A [server] system for providing answers on one or more topics from a set of experts on each topic to questions posed by users in communication with client interfaces, the server being in communication with the client interfaces and the set of experts and comprising:

a question receiving component configured to receive at the server a question received from a user via one of the client interfaces;

a routing component configured to route the question to one of the experts selected by the user, wherein said routing component is further configured to display the question with other questions for [said one of the experts] the expert on [the] a personal expert interface [of said one of the experts], wherein the personal expert interface is unique to the expert and includes the question as one of a set of open questions being separately grouped and identified as open questions for the expert to answer and at least one of the open questions being routed to the expert based on requests from one of (a) one of the users and (b) one of the experts;

a command receiving component configured to receive a command from the selected expert in response to the question; and

an executing component configured to execute the command from the selected expert automatically.

88. (Thrice Amended) A system for providing answers on one or more topics from a set of experts on each topic to questions posed by users via client interfaces in communication with the server, the server comprising;

a question receiving component configured to receive at one of the client interfaces a question on the selected topic;

a transmitting component configured to transmit the question from the client interface to the server;

a routing component configured to route the question to said set of experts, at least one of them having been selected through the client interface, by posting the question in plurality of locations, wherein each of said locations is accessible to only one expert of said set of experts and wherein each of said locations includes the question as one of a set of open questions being separately grouped and identified as open questions for the expert to answer and at least one of the open questions being routed to the expert based on requests from one of (a) one of the users and (b) one of the experts;

a command receiving component configured to receive a command at the server from the [one of the experts] expert in response to the question; and

an executing component configured to execute the command from the [selected] expert automatically.

97. (Twice amended) A method, executed by a server, for providing answers [on one or more topics] from a [set] plurality of experts [on each topic] to questions posed by a plurality of users [in communication], the users communicating with the server via a plurality of client interfaces [to], each of the client interfaces being identified to the users as a forum on a predetermined subject matter and as presenting experts on the subject matter, whereby each

of the users selects between a plurality of fora [the server being in communication with the client interfaces and the set of experts, and], the method comprising:

receiving at the server [a question] one of the questions received from [a user] one of the users via one of the client interfaces;

routing the question to [one of the experts] at least one expert associated with the forum and selected by the user, wherein said routing component is further configured to display the question on [the] a personal expert interface [of said one of the experts], wherein the personal expert interface is unique to the expert and includes the question as one of a set of open questions routed to the expert based on a request from one of (a) one of the users and (b) one of the experts;

receiving a command from the [selected] expert in response to the question, wherein said command comprises a command to post an answer to the question selectively in at least one of [a] the plurality of fora; and

executing the command from the [selected] expert automatically.

98. (Twice Amended) A [server] system, executed by a server, for providing [answers] a plurality of answers [on one or more topics] from a [set] plurality of experts [on each topic] to a plurality of questions posed by a plurality of users [in communication], the users communicating with the server via a plurality of client interfaces [to], each of the client interfaces being identified to the users as a forum on a predetermined subject matter and as presenting experts on the subject matter, whereby each of the users selects between a plurality

of fora [, the server being in communication with the client interfaces and the set of experts and], the system comprising:

[a] one of the plurality of [question] questions receiving component configured to receive at the server a question received from a user via one of the client interfaces;

a routing component configured to route the question to one of the experts selected by the user providing the question[, wherein said routing component is further configured] and to display the question on [the] a personal expert interface [of said one of the experts], wherein the personal expert interface is unique to the expert and includes the question as one of a set of open questions being separately grouped and identified as open questions for the expert to answer and at least one of the open questions being routed to the expert based on requests from one of (a) one of the users and (b) one of the experts;

a forum component configured to receive answers posted by said set of experts, wherein said forum component comprises [a] the plurality of fora;

a command receiving component configured to receive a command from the [selected] expert in response to the question[, wherein said command receiving component further comprises a post in at least one of plurality of fora command receiving component configured to receive a command] and to post an answer to the question in at least one of [a] the plurality of fora; and

an executing component configured to execute the command from the [selected] expert automatically.